

## **REMARKS**

### **I. Introduction**

Claims 1-7 are pending and stand rejected. With this amendment, claims 1, 3, 6, and 7 are amended. Claim 1 is the only independent claim.

### **II. The Rejections**

Claims 1-7 were rejected under 35 USC 103(a) as being unpatentable over US Published Application No. 20040264947 to Okada in view of US Published Application No. 20030126201 to Hoang and further in view of US Patent No. 5,592,669 to Robinson. These rejections are traversed for the reasons stated below.

### **III. The Pending Claims are Allowable**

Amended claim 1 recites defining in a memory a free memory list and the free memory list is contained in a first physical memory area of the memory. The free memory list is configured to contain one or more portions of one or more files. A file is stored in the memory. The file includes a first portion contained in a second physical memory area of the memory and a second portion contained in a third physical memory area of the memory; The first portion of the file is selected for deletion. Only the selected first portion of the file is copied from the second physical memory area to the first physical memory area containing the free memory list without copying the second portion of the file contained in the third physical memory area and resulting in the second physical memory area being deallocated. The Applicant's amendments are supported at page 7, line 22- page 9, line 4 of the disclosure.

Okada teaches a system where video segments are stored on an optical disc. Okada's system has the ability to delete a partial video object unit (VOBU) from video objects (VOBS). Okada, paragraph 367. No free memory list is used in Okada.

Okada does not teach or suggest that only a first portion of a file (contained in a second physical memory area) is copied to a free memory list (contained in a first physical memory area) without copying a second portion (contained in a third physical memory area) to the memory list thereby leaving only the first portion as deallocated all as recited in claim 1. To the contrary and as admitted in the Office Action, Okada does not even teach

the use of a free memory list, much less copying portions of a file in one physical memory area to any list in another physical memory area as recited in claim 1.

As for Hoang, a system where a listing of free memory blocks is apparently maintained. Hoang, paragraph 41. However, Hoang states that the listing provides an “indirection” to a free/unused portion of memory. Hoang, paragraph 34. Put another way, Hoang utilizes pointers to point to free sections of memory and does not copy portions of files into any list.

Hoang does not teach or suggest that only a first portion of a file (contained in a second physical memory area) is copied to a free memory list (in a first physical memory area) without copying a second portion (in a third physical memory area) thereby leaving only the first portion deallocated as recited in claim 1. To the contrary, only pointers to free areas of memory are provided in the Hoang system; the listing of Hoang can not and does not include the file portions themselves. See Hoang, paragraph 41.

As for the Robinson reference, a file structure that is erasable only in blocks is described. More specifically, as described in Robinson, a memory is divided into fixed-sized blocks. These fixed-sized blocks may include files. When a memory block is erased, all files in the block are erased including all portions of these files. See, e.g., Robinson, FIG. 8, element 132, and the accompanying text.

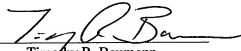
Robinson does not teach or suggest copying only a selected first portion of a file (contained in a second physical memory area) to a free memory list (contained in a first physical memory area) without copying the second portion (contained in a third physical memory area) of the file and leaving a deallocated portion of memory corresponding only to the first portion as recited in claim 1. To the contrary, Robinson does not contain a free memory list. Moreover, the Robinson system copies entire files, never portions of these files.

Since at least one element of claim 1 is not taught or suggested by any of the cited references, it is submitted that claim 1 is allowable over the proposed combination. Claims 2-7 depend directly or indirectly upon claim 1. Since claim 1 is allowable, it is submitted that these dependent claims are also allowable.

**IV. Conclusion**

The Commissioner is hereby authorized to charge any additional fees which may be required in this application to Deposit Account No. 06-1135.

Respectfully submitted,  
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